

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE

**JOSE ALFONSO CARRASQUILLO
ORTIZ**

Debtors

P.R. ELECTRIC POWER AUTHORITY

Plaintiff

V.

**JOSE ALFONSO CARRASQUILLO
ORTIZ**

Defendant

**JOINT NOTICE & REQUEST FOR ENTRY OF ORDER REGARDING EXTENSION
OF TIME TO FILE PROPOSED SETTLEMENT AGREEMENT**

COME NOW plaintiff the Puerto Rico Electric Power Authority (“PREPA” or “Plaintiff”) and defendant José Alfonso Carrasquillo Ortiz (“Defendant”), through their respective undersigned counsel, and very respectfully state, allege and pray:

1. On May 28, 2018, the parties of the instant adversary proceeding filed a “Joint Notice and Request for Entry of Order Regarding Extension of Time to File Proposed Settlement Agreement” (the “Notice”). See Dkt No. 31. In the Notice the parties informed that the parties agreed to settle the adversary proceeding of caption and that the final version of a proposed settlement agreement had been drafted. Since the proposed settlement agreement must be approved by three different departments and/or divisions of PREPA, in the Notice the parties requested 30 days to get PREPA’s approval of the said agreement.

2. To this day PREPA's approval of the said agreement is still pending, however PREPA expects to get the final approval of the proposed settlement within the next 20 days.

3. In light of the above, Plaintiff and Defendant respectfully request from this Honorable Court to grant twenty (20) days (due on July 19, 2018) to allow the parties to obtain the signatures to be included in the proposed settlement that will be filed before this Honorable Court within this time.

4. This request for time to file a settlement agreement has been filed in good faith and without any intent to delay Court proceedings or adversely affect the rights of any party in interest.

WHEREFORE PREPA and Defendant respectfully request from the Honorable Court to take notice of the above and allow the parties of the instant adversary proceeding to file the proposed settlement within the next twenty (20) days.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of June 2018.

NOTICE TO INTERESTED PARTIES: Within fourteen (14) days after service of this motion, as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bankr. P. 9006(f) if you were served by mail, any party against whom this motion has been served, or any other party to the action who objects to the relief sought in this motion, shall serve and file an objection or other appropriate response to this motion with the Clerk's Office of the U.S. Bankruptcy Court for the District of P.R. If no objection or other response is filed to this motion within the time allowed herein, this motion will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I hereby certify that on June 29, 2018, I electronically filed a copy of the foregoing motion with the Clerk of the Honorable Court, using the CM/ECF system, which will send electronic notice of the motion to all CM/ECF interested participants, including counsel for Debtors.

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